

700 Milam Street Suite 2700 Houston, Texas 77002-2806 Main 713.222.1470 Fax 713.222.1475 munsch.com

July 2, 2015

Kenneth Talton, Enforcement Officer Superfund Enforcement Assessment Section (6SF-TE) U.S. EPA, Region 6 1445 Ross Avenue Dallas, Texas 75202-2733

Re:

SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana;

CERCLIS #: LAD008434185; Information Request Pursuant to CERCLA Section 104(e), 42 U.S.C. §9604(e), Information Request

Mr. Talton:

Kinder Morgan Bulk Terminals Inc. on behalf of itself and on behalf of Hall-Buck Marine, predecessor to Kinder Morgan Bulk Terminals Inc. hereinafter referred to as ("Kinder Morgan") hereby provides its response to EPA's Requests for Information Pursuant to CERCLA Section 104(e) – SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana.

Kinder Morgan reserves the right to supplement this response should any additional responsive information be discovered. Kinder Morgan has endeavored to answer the questions in EPA's letter to the fullest extent reasonably possible. The enclosed information is being provided in an effort to cooperate with the EPA, without admitting or acknowledging that EPA has the authority to request production of the information requested, or that the statutory authority asserted in the information request is applicable. Additionally, nothing in this response should be construed as an admission of any liability or responsibility on the part of Kinder Morgan regarding any costs incurred by EPA or any other party relating to the Site. Kinder Morgan reserves all defenses and rights available to it under the law.

Please let me know if there is any other information that you may need.

Sincerely,

Mary Koks

cc: I-Jung Chiang Mary Lyons

500011391

I. GENERAL OBJECTIONS

Kinder Morgan Bulk Terminals, Inc., formerly known as Hall-Buck Marine, Inc. ("KMB") asserts the following privileges, protections, and objections with respect to the Requests:

KMB asserts all privileges and protections applicable to documents and other information sought by EPA, including the attorney-client privilege, the attorney work product doctrine, all privileges and protections related to materials generated in anticipation of litigation or in allocation processes, the settlement communication protection, joint defense privilege, and any other privilege or protection available to it under law. KMB objects to the Requests to the extent they seek privileged information.

KMB asserts the information being provided herein pertaining to KMB's customers, customer base or vendors is confidential business information within the meaning of 40 C.F.R. § 2.203(b), and is therefore subject to the protections set forth in 40 C.F.R. Part 2, Subpart B. KMB objects to the Requests to the extent they seek the disclosure of information subject to, and which would be in violation of, confidentiality agreements.

KMB objects to the definition of the term "identify" to the extent it seeks information outside the possession, custody, or control of KMB, and as being unduly burdensome to the extent it requires detailed descriptions of documents, the contents of which speak for themselves. KMB also objects to the definition of the term "identify" to the extent it encompasses home addresses of natural persons. Subject to this objection, current KMB employees and any other natural persons are identified by name and corporate addresses. KMB requests that any contacts with KMB employees identified in these responses or the related documents be initiated through counsel representing KMB.

KMB objects to the definition of "documents" to the extent it extends to documents not in KMB's possession, custody or control. KMB disclaims any responsibility to search for, locate, and/or provide EPA copies of any documents known by KMB to exist, but not in KMB's possession, control, or custody.

KMB objects to the definition of "your" and "your" as overbroad. KMB will only respond with respect to KMB. Further, KMB is not familiar with, nor understands, what is referenced as "tastes" in the definition.

II. RESPONSES TO GENERAL INFORMATION CONCERNING RESPONDENT.

1. Provide the full legal name and mailing address of the Respondent.

Kinder Morgan Bulk Terminals, Inc., formerly known as Hall-Buck Marine, Inc. 1001 Louisiana St., Suite 1000 Houston, Texas 77002

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.

Mary Clair Lyons Assistant General Counsel 1001 Louisiana St., Suite 1000 Houston, Texas 77002 713-420-4313

Zach Smith Regional EHS Manager 7116 Highway 22 Sorrento, LA 70778 (225) 675-0302

Terri Lanoux Executive Assistant 7116 Highway 22 Sorrento, LA 70778 (225) 675-0325

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

Mary Clair Lyons Assistant General Counsel 1001 Louisiana St., Suite 1000 Houston, Texas 77002 713-420-4313

4. If Respondent is a business, please give a brief description of the nature of the business.

Kinder Morgan Bulk Terminals, Inc. operates dry bulk terminals that store petroleum products and chemicals, and handles bulk materials like coal, petroleum coke, and steel products for various customers. Formerly known as Hall-Buck Marine, Inc., KMB changed its name in August, 1998. KMB does not own the materials it handles or stores. Custody of all such materials remains with the customers. While KMB commonly loads or unloads dry products from customer-supplied barges, it does not own or operate any barge fleeting operations.

III. Kinder Morgan Bulk Terminals Inc.'s Responses to CERCLA Section 104(e) Request for Documents

- 1. Please identify any dealings or transactions you have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LLEVAC Shipyards Jennings, LLC. Please provide a brief description of the nature of those dealings or transactions and the timeframes during those dealings and transaction occurred.
 - a. Specifically, provide dates of when you sent or moved something to the Site and the name and contact information of the person who made such arrangements.

On or about September 8, 1997, a deck barge, GTC-4 (Official #262179), was sent to the Site for surveying. It is unknown who arranged this transfer.

On or about June 13, 1997, a deck barge, RVC-101 (Official #545934), was sent to the Site for surveying. It is unknown who arranged this transfer.

KMB has not identified any other dealings or transactions with the Site.

2. Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 1 above.

KMB has the two Marine Chemist Certificates which were provided to it by the EPA on June 9, 2015. KMB has not located any other documents relating to the Site.

3. If any of the dealings or transactions described involves hazardous materials, please include a detailed listing of such materials, the materials data safety sheet, dates of transaction, and any quantity associated with those materials.

Deck barges, such as the RVC-101 and the GTC-4, are not used for the transportation, shipment, or storage of materials, products, or goods. KMB used these barges as a floating crane docks in the handling of bulk products at its facilities. The RVC-101 was in service in Moundsville, WV bulk terminal (MBT) and used to load product (green and calcined coke) into other customer-provided barges. As of July 3, 2001, the RVC-101 was part of KMB's mobile inventory at this facility as evidenced in the attached 2001 Mobile Equipment List. Subsequently, KMB sold the Moundsville terminal, including this deck barge.

GTC-4 Barge was a deck barge initially used as a crane deck barge at the Hall-Buck Profit Island Transfer Terminal, LA (PITT) as evidenced by the attached 1997 Mobile Equipment List. Based on testimony, it was moved to Reynolds Coke Dock in Baton Rouge, LA when all of the PITT's operations were relocated in 1997.

4. Please describe in detail any involvement you had with the 2002 RCRA Interim Measures/Removal Action (IM/RA) at the Site. Please provide any and all documents in

your possession related to the IM/RA, including, but not limited to, a listing of the parties involved in the IM/RA.

KMB had no involvement in the IM/RA at the Site.

5. Please provide the names, title, and contract information of anyone, including, but not limited to, employees, who may possess knowledge and information regarding this Site and/or your own business operations.

None known.

- 6. Identify all of the individuals who currently have and those who have had responsibility for the Respondent's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of the Respondent's wastes). This information shall include, but not be limited to, the following:
 - a. Each individual's job title and duties (including the dates performing those duties),
 - b. The supervisors for such duties,
 - c. The current position or the date of the individual's resignation, and
 - d. The nature of the information possessed by such individuals concerning the Respondent's waste management.
 - e. The contact information of the individual

KMB objects to this question as it is overbroad as it requests information all KMB's environmental matters, and not limited to environmental matters related to the Site. KMB has no knowledge of shipping any waste to the Site. Without waiving any of its objections: KMB's regional environmental manager is:

Zach Smith Regional EHS Manager 7116 Highway 22 Sorrento, LA 70778 (225) 675-0302

7. Does the Respondent's company or business have a permit(s) issued under RCRA? If so, provide a copy(ies) of the permit(s).

KMB objects to this question as it does not pertain to waste shipped to the Site and is thus not relevant. Additionally, the question is overbroad as it requests information relating to RCRA permits held by "Respondents company or business" and KMB cannot tell to

which of its numerous facilities the EPA is referring. Further, KMB's RCRA permits would not provide useful or relevant information to waste, if any, shipped to this Site, or to business conducted with the various companies referred to in Question 1.

8. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

KMB objects to this question as it does not pertain to waste shipped to the Site and is thus not relevant. Additionally, the question is overbroad as it requests information relating to RCRA identification numbers issued to "Respondent by EPA or a state for Respondents operations." KMB cannot tell to which of its numerous facilities or operations the EPA is referring. Additionally, it requests Identification Numbers issued by a "State" and the term "State" is not defined so KMB has no way to guess to which state the EPA is referring. Further, KMB's RCRA Identification Number(s) would not provide useful or relevant information to waste, if any, shipped to this Site or business conducted with parties referenced in Question 1.

Without waiving any of its objections: KMB does not have any identification numbers relating to this Site.

9. Does the Respondent's company or business have, or has it ever had, a permit(s) under the hazardous waste laws of the State? If so, provide a copy (ies) of the permit(s).

KMB objects to this question as it does not pertain to waste shipped to the Site and is thus not relevant. Respondent objects to this question as it does not indicate what type of permit is requested. Additionally, it requests permits under the "hazardous waste laws of the State" and the term "State" is not defined so KMB has no way to guess to which state the EPA is referring. Respondent has facilities in various states and it would be unduly burdensome to provide copies of every permit for every facility located in every state. Moreover, such information has no relevance to waste, if any, shipped to this Site nor to business conducted with the parties referred to in Question 1.

Without waiving any of its objections: KMB does not and has never held a permit relating to the Site.

10. Does the Respondent's company or business have an EPA Identification Number, or an identification number supplied by the State? If so, supply any such identification number(s).

KMB objects to this question as it does not pertain to waste shipped to the Site and is thus not relevant. KMB objects to this question as it does not indicate which of the Respondent's companies or businesses to which the EPA is referring. Additionally, it requests identification numbers "supplied by the State" and the term "State" is not defined so KMB has no way to guess to which state the EPA is referring. KMB has facilities in various states and it would be unduly burdensome to provide information on every identification number issued for every facility in every state. Moreover, such

information has no relevance to waste, if any, shipped to this Site nor to business conducted with the parties referred to in Question 1.

Without waiving any of its objections: KMB does not and has never had EPA Identification Number, or an identification number supplied by the State of Louisiana, relating to the Site.

11. Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

KMB objects to this question as it is not limited to waste shipped to the Site and this is overly broad. Further, the EPA has not identified what type of "hazardous waste information" it is seeking. Additionally, the request is extremely overbroad as Respondent has facilities in many states and is required to file various types of waste information with multiple agencies. Thus, it is impossible to determine to which facility, which information and to which state the EPA referring. Finally, it is impossible to determine to what time frame the EPA is referring by the generic "state the years during which such information was sent or filed".

Without waiving any of its objections: KMB has not filed hazardous substance or hazardous waste information to federal, state, and local offices and agencies relating to the Site.

12. Provide copies of all documents created or kept by the Respondent related to the nature, quantity, or source of the materials taken to the Site.

KMB conducted a thorough review of the retained records from Hall-Buck. No such documents were found, and KMB has no knowledge of any waste shipped to the Site.

- 13. If barges were placed or disposed at the Site, provide the following information:
 - a. Where they were placed or disposed, and
 - b. Their condition when placed or disposed.

KMB has no documentation it disposed of barges at the Site. In 2001, the RVC-101 was located at KMB's Moundsville, VW bulk terminal. See attached 2001 Mobile Equipment List. This barge is still registered under the Official #545934 with the U.S. Coast Guard as a passenger barge. Based on employee's recollection, the GTC-4 Barge remained at the former Reynolds Coke Dock (also known as the Barge Canal Dock). KMB sold this facility in March 11, 2015. This barge is not currently registered with the U.S. Coast Guard under the Official #262179. KMB does not have any additional information relating to the GTC-4.

14. Identify other individuals and entities that the Respondent has reason to believe may have taken or sent materials to the Site. Of these individuals and entities, specify which were observed by the Respondent at the Site and indicate when those observations were made. Provide all of the information known by the Respondent regarding the customers of these entities or individuals.

KMB has no additional information relating to the Site.

HALL - BUCK MARINE, INC., (MOBILE EQUIPMENT LIST)

\$6,592,722

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And the same			1990	PRINCIPLE PROPERTY OF THE PROPERTY OF	Ford		05/95		\$7,500
141		Vehicle - Truck A202					04/93		
142		Vehicle - pick-up truck	1993	F150	Ford				\$12,000
143		Vehicle - pick-up truck	1994		Cheverlot		12/93	400	\$13,000
		Clamshel(Bucket	1992		HAWCO		01/92	405 cu. ft. w/lap seal & spill plates	
	PITT	Dock Barge - GTC-4	1951		Unknown		08/79	264' x 50' x 11'	\$85,000
	PITIT .	Spar Barge - MR-355	1959		Jeffboat		09/77	195:1' x 35.1' x 10.7'	\$85,000
	PITT .	Vehicle - tank trailer	1967	*	Gind	S/N 36446	<u></u>	wash water collection, 6,000 gal.	\$2,000
148	PITT	Vehicle - coke trailer	1968	٠	Dunn	S/N: 4307862023T	03/94	Bóttom dump	\$6,000
149	PITT	Vehicle - coke trailer # 1	1982		Wilson	2 X8676	12/79	Bottom dump	\$400
150	PITT	Trailer - office	1987		Manor-	S/N 3314		12' X 56'	\$4,000
151	PITT	Vehicle - coke trailer # 2	1987		Hawkeye	1BJSH4223H1001750	unknown	Bottom dump	\$1,500
152	PITT	Vehicle - coke trailer # 3	1990		Hawkeye	1BJSH4228 8 9001963	unknown	Bottom dump	\$9,000
153	PITT	Vehicle - coke trailer # 4	1990		Hawkeye	1BJSH422XL1001964	unknown	Bottom dump	\$9,000
154	PIT	Compressor - shop	1993	QTH10-120		S/N 5031065			\$1,500
155	PITT	Two-Wheel Trailer		EDT-2400			08/93	2" Ball Hitch	\$850
156	RCD	Sweeper	1982	600	Tymco	NA	11/96		\$14,500
157	RCD	Front Endloader	1993	WA-120-1	Komatsu	S/N A20094	03/96	W/1.75 Cu. Yd. Bucket	\$40,000
158	RCD	Vehicle - Pickup Truck	1996	Sonoma	GMC	1GTCS1440TK501831	10/95		\$12,400
159	RCD	Welding machine			Lincoln	S/N: 879619	03/85	200 AMP	\$1,500
160	RCD	Crane		3900V	Manitowoc			Under Construction	
161	RRL (WPSI)	Backhoe	1977	580B	Case	5209818	11/91		\$5,000
	RRL (WPSI)	Vehicle Pickup Truck	1986	S-10	Chevrolet	1GCC\$14R0G8165161	01/91		\$3,000
	RRL (WPSI)	Vehicle Pickup	1990	· C2500	Chevrolet	1GCGC24K8LE237839	11/94	Plate # 4D78619	\$8,250
	RRL (WPSI)	Vehicle Pickup Truck	1994	F-250	Ford	1FTHX25HORKA62296	12/93		\$15,000
	RRL (WPSI)	Locomotive - WPSI-201		EMD SW-14					\$150,000
	RRL (WPSI)	Locomotive - WPSI-202		EMD SW-14					\$150,000
-	Sorrento	Vehicle - auto	1992	<u> </u>	Chevrolet	2G1WL54T8N8273518	09/92	GJS	
	Sorrento	Vehicle - Auto	1996	Sonoma	GMC	1GTCS1446TK502336	11/95	Office	\$12,400
	TCM (WPSI)	Case Loader Scraper	1987	480LL		17003650	03/97		\$14,500
	TCM (WPSI)	Vehicle - Truck A201	1990	F-150	Ford	1FTEF15N0LPA65537	05/95		\$7,500
	TCM (WPSI)	Office Trailer	1994		Evergreen	1094-103	06/95	10' x 32' AC ·	\$14,000
	TCM (WPSI)	MIG Welder	1995		Miller		05/95		
	TCM (WPSI)	Diesel Welder			Perkins	A1160988	05/95		\$4,100
	TCM (WPSI)	Hot Water Pressure Worker			Whitco	1092-4609	05/95		\$1,400

HALL - BUCK MARINE, INC., (MOBILE EQUIPMENT LIST)

\$7,458,356

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143	NJBT	Crane	1996	3950D	Coastal		i	Under Construction @ Kostmayer's	\$938,400
144	NJBT	Bucket		966D			04/97	4-Yard Bucket	\$9,885
145	NUBT	Bucket			Hawco	RH-1102		5.5 Cu. Yd.	\$49,200
146	NJBT	Skid Loader #8119		940	Mustang	5469229	05/95	w/1-60 Bucket, #8119	\$16,500
147	NJBT	Sweeper Attachment					05/95	#8125	\$2,400
148	PABFAC	Barge - Deck	?	. •		Undocumented	02/85	130' x 30' x 8'	\$2,000
149	PABFAC	Vehicle - winch truck	1984		Chevy	1GBHC34M4EV109620	??/84		\$500
150	PABFAC	Office Building - Modular	1985		Custom Craft	CCLA-850260240857	02/85	24' x 60' (Sitting on JLS-3 Barge)	
151	PABFAC	Steam cleaner	1985			N/A	01/89	1	\$1,500
152	PABFAC	Welding machine	1989		·	S/N A1141608	10/89	250 AMPS	\$3,000
153	PABFAC	Portable Building	1995		Morgan		06/95	10' x 12'	\$1,400
154	PABFAC	Vehicle - Auto	1996	Sonoma	GMC	1GTCS1441TK501787	10/95	Office	\$12,400
155	PBT-4	Vehicle - pick-up truck	1984	Ranger	Ford	1FTCR10S2EUD50790	09/96		
156	PBT-4	Traller	1960		Frueh	VIN: FR50395	04/90	34,000#	\$4,000
157	PBT-4	Forklift	1962	<u>.</u>	Clark		??/89	C - 8,000 #	\$2,500
158	PBT-4	Vehicle - vacuum truck	1967	Loadstar 1700	International		??/89		\$3,000
159	PBT-4	Front end loader	1981	510B	International	J000820	1988	w/5/8" c.y. bucket	\$15,000
160	PBT-4	Shuttle wagon	1986	SWX35A	Catapiller	S/N 5H3508	06/88		\$80,000
161	PBT-4	Vehicle - Truck A202	1990	F-150	Ford	1FTDF15N7LPA62467	05/95		\$7,500
162	PBT-4	Vehicle - pick-up truck	1993	F150	Ford	1FTEF15Y1PLA20520	04/93	·	\$12,000
163	PBT-4	Vehicle - pick-up truck	1994		Cheverlot	1GCDC14Z9RZ130861	12/93		\$13,000
164	PBT-5	Vehicle - pick-up truck	1972		Ford	F25YRP31345	03/97		\$3,000
165	PBT-5	Vehicle - pick-up truck	1985	F15	Ford	1FTCF15Y9FPA76901	04/97		\$3,300
166	PBT-5	Utility Truck	1988	Ram 350	Dodge	1B6M03450JS722088	03/97	Dual Axle	\$8,000
167	PBT-5	Golf Carts (2)	1994	GX-444	Ezgo	795395 / 781568	03/97		\$6,700
168	PBT-5	Forklift	1994	C500Y685	Clark	0263-9215	02/97	Used, 8,000 lb. basic capacity	\$20,500
169	PBT - DRAVO	Clamshell Bucket	1992		HAWCO	G-830	01/92	405 cu. ft. w/lap seal & spill plates	
170	RCD	Sweeper	1982	600	Tymco	NA .	11/96		\$14,500
171	RCD	Crane	1997	3900V	Manitowoc	391345	04/97		\$807,085
172	RCD	Vehicle - tank trailer	1967		Gind	S/N 36446		wash water collection, 6,000 gal.	\$2,000
173	RCD	Vehicle - coke traller	1968	·	Dunn	S/N: 4307862023T	03/94	Bottom dump	\$6,000
174	RCD	Front Endloader	1993	WA-120-1	Komatsu	S/N A20094	03/96	W/1.75 Cu. Yd. Bucket	\$40,000
175	RCD	Vehicle - Pickup Truck	1996	Sonoma	GMC	1GTCS1440TK501831	10/95		\$12,400
176	RCD	Welding machine		ŀ	Lincoln	S/N: 879619	03/85	200 AMP - Does not run per GDC	\$0

KINDER MORGAN BULK TERMINALS, INC. (MOBILE EQUIPMENT LIST)

\$11,591,658

#	LOCATION	EQUIPMENT TYPE	YR.	MODEL	MFR.	"VIN" OR S/N	ACQ'D	COMMENTS	AMOUNT
73	GBT	Vehicle - pick/up truck	1989	F150	Ford	1FTDF15N7KNA68389	12/98		\$5,200
74	GBT	Boat Motor	?		Johnson	B08939321	?	6-HP Engine	\$1,000
75	GBT	Barge (James W) - GBT-1	1958		Marietta Mfg.	Official # 596848	10/83	195'x35'x10'	
76	GBT	Barge (Perry M) - GBT-2	1958		Marietta Mfg.	Official # 596849	10/83	195'x35'x10'	
77	GBT	Welding machine	1975		Lincoln	106743	01/84	200 AMPS	\$1,500
78		Barge (NMS-1484)-GBT-3	1979		Nash. Bridge	Official # 602718	04/91	195'x35'x12'	
79	GBT	Shuttle wagon	1984	SWX-20	T&J Ind.	SE-1001	1984	Standby Unit	\$50,000
	GBT	Rescue Boat	1984		Starcraft	STRM47080384C4	08/84	20' x 48' x 14'	\$200
	GBT	Front End Loader	1989	#543	Bobcat	502423815	04/89	W-3,270#	\$10,000
	GBT	Vehicle - Truck	2000	Sierra TC15703	GMC	1GTEC14W7YZ367714	08/00		·
-		Mule	1995		Kawasaki		06/95		\$7,000
	GBT	Cherry Picker			Omega (20)		1989		\$10,000
-	GBT	Barge (SCNO1445)-GBT-4			Amer. Marine			195'x35'x10'	
88	GLC	Clamshell Crane	1997	M-250	Manitowoc	2501096		167,000#	\$1,034,925
		Crane Barge M-557	1960		Bethlehem	Official # 007260	10/93	195'x52'x11'	\$90,000
		Clam bucket - 8 C/Y	1976	MCM2	McGinnis	10009	??/75	W- 10,500 #, lite duty service	\$8,000
	GLC	Vehicle - pick/up truck	1986	1 100112	GMC	1GTCC14HIGF733000	10/86		\$2,000
	GLC	Front Endloader	1987	60Z II	Kawasaki	5055	10/92	W-	\$25,000
-	GLC	Hopper - Feeder	1993	002.11	Texmarc	N/A	03/93	48 cu yd, manual gates, 36" conveyd	\$97,000
		Portable Building	1994		Scales	8952	06/04	8' x 10'	\$2,000
		Portable Building	1995		Morgan		06/95	10' x 12'	\$1,400
_	GLC	Bucket - M-250	1997	CSLR-1500-2	Mack		03/97	15 cy, 18550 pds.	\$51,000
	GLC	Front Endloader		916-G	Caterpillar	2xB01773			
		Endloader		510B Int.	Dresser	3380141C002315	10/94	Engine Serial No. 44358894	
		Generator -					·		\$10,000
98	GRT	Vehicle - Fuel Truck	1992	F800	Ford	1FDWK84A3NVA09772		White	\$18,400
	GRT	Skid Loader		1845C	Case	JAF0275713	03/99		\$24,200
100		Skid Loader Pickup Broom			Sweepster	9909084	03/99		\$3 ,900
101	LAXT	Street Sweeper	1997	H81	Ford	1FDXH81C0VVA42673		Air Sweeper - G-3541-D	\$117,235
102	.AXT	Guzzler - Vacuum Truck	1997	W90	Ford	1FDZW90X2VVA17153	10/97		\$216,368
103	LAXT	Pickup Truck	1998	<u> </u>	Ford	1FTZF17W0WNA15566			\$16,800
104	LAXT	Forklift ,		H90XL-2	Hyster	F005D06259N	10/97	Self-dump. hopper SN: 211711; 48" Forks	\$20,860
105	MBT	HTCO-1802	1949			Official # 257763	07/97	240' x 50' x 11'	\$55,000
		Deck Barge - RVC-101	1951		4 Mer. 2 Miles	Official # 545934	04/97	240' x 50' x 11.5'	\$120,000
107	MBT	Wheel Loader	1996	924F	Caterpillar	5NN00719	01/98	Used	\$72,000

07/02/2015 US POSTAGE

\$01.20°



ZIP 77002 041L11247229

MUNSCH HARDT KOPF & HARR PC

ATTORNEYS & COUNSELORS
DALLAS | HOUSTON | AUSTIN

Pennzoil Place 700 Milam, Suite 2700 Houston, TX 77002-2806

Ms. I-Jung Chiang, Attorney Office of Regional Counsel (6RC-S) U.S. EPA, Region 6 1445 Ross Avenue Dallas, Texas 75202-2733

15462.2/MWK